

EXHIBIT A:
INFORMATION CONCERNING DISPUTED CLAIM
TERMS, PURSUANT TO SPR 6.1(c)(2)

Claim term: “a piston moveable between a retracted position and an extended position within the cylinder”

Party or Parties	Proposed Construction	Supporting Intrinsic Evidence	Supporting Extrinsic Evidence
Davies Innovations Inc. and Sturm, Ruger & Company, Inc.	Plain and ordinary meaning, i.e., “a piston moveable between a retracted position and an extended position within the cylinder”	None provided.	None provided.
SIG Sauer, Inc.	“A piston that laterally moves between a forward (retracted) position and a rearward (extended) position, in each of which positions the piston is borne by and resides directly inside the cylinder.”	<p><i>‘722 Patent Specification:</i></p> <ul style="list-style-type: none"> • Col. 4, ll. 50-51 (“Piston assembly 34 includes a cylinder 40, a piston 42 and an end plug 43.”); • Col. 4, ll. 55-59 (“Piston 42 is carried within cylinder 40 and includes a hollow piston head 45 with self cleaning grooves 46 formed in piston head 45, to prevent build-up of powder residue such as carbon, engaging an inner surface of cylinder 40.”); • Col. 4, ll. 62-64 (“Piston 42 is movable between a retracted position as shown in FIG. 3, and an extended position as shown in FIG. 4.”); • Figures 3 and 4; • Col. 3, ll. 21-27, 30-35 (“The foregoing and further and more specific objects and advantages 	<p><i>Images of Aspects of Mr. Davies’ Commercial Embodiment</i></p> <ul style="list-style-type: none"> • DAV000390, DAV000404, DAV000409 <p><i>Excerpt from “The Reduced Recoil Operational Compensation (RROC) Rifle and Carbine Upgrade User Manual January 2003”</i></p> <ul style="list-style-type: none"> • DAV000497 (“When a cartridge is fired and the bullet passes the gas port, a small amount of gas is drawn off through the barrel gas port into the gas cylinder. This passes through a hole in the gas piston and drives the gas piston to the rear.”)

		<p>of the invention will become more readily apparent to those skilled in the art from the following detailed description of a preferred embodiment thereof, taken in conjunction with the drawings in which: FIG. 1 is a side elevation view of a rifle in accordance with the present invention;... FIG. 3 is a view in top plan of a portion of the rifle of FIG. 1, illustrating an operating system at initiation of a cycle, in accordance with the present invention; FIG. 4 is an enlarged partially exploded perspective view of a portion of the operating system of FIG. 3, at subsequent position of the cycle”)</p>	<p><i>Excerpts from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000511, DAV000514-DAV000518 <p><i>Undated Schematic Drawing with annotations:</i></p> <ul style="list-style-type: none"> • DAV000632 <p><i>Letter from Dr. John P. Keady to Robert Davies (circa July 23, 2012)</i></p> <ul style="list-style-type: none"> • DAV02430-DAV02434
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Claim term: “an end plug removably closing the open forward end of the cylinder”

Party or Parties	Proposed Construction	Supporting Intrinsic Evidence	Supporting Extrinsic Evidence
Davies Innovations Inc. and Sturm, Ruger & Company, Inc.	Plain and ordinary meaning, i.e., “an end plug removably closing the open forward end of the cylinder”	None provided.	None provided.
SIG Sauer, Inc.	A cap, separate from the cylinder in which the piston resides, that can be removed from (and when in place, closes) the open forward end of the cylinder.	<p><i>‘722 Patent Specification:</i></p> <ul style="list-style-type: none"> • Col. 4, ll. 50-51 (“Piston assembly 34 includes a cylinder 40, a piston 42 and an end plug 43.”); • Col. 4, ll. 53-55 (“End plug 43 is threadedly engaged in and closes the forward end of cylinder 40.”); • Figures 3 and 4; • Col. 3, ll. 21-27, 30-35 (“The foregoing and further and more specific objects and advantages of the invention will become more readily apparent to those skilled in the art from the following detailed description of a preferred embodiment thereof, taken in conjunction with the drawings in which: FIG. 1 is a side elevation view of a rifle in accordance with the present invention;... FIG. 3 is a view in top plan of a 	<p><i>Excerpt from “The Reduced Recoil Operational Compensation (RROC) Rifle and Carbine Upgrade User Manual January 2003”</i></p> <ul style="list-style-type: none"> • DAV000499 (“Using the 3/8 inch combination wrench provided with the RROC, unscrew and remove the gas cylinder plug. Covering the open end of the gas cylinder with a finger, tip the upper receiver down and allow the gas piston to slide out.”) <p><i>Excerpts from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000511, DAV000514-DAV000518

		<p>portion of the rifle of FIG. 1, illustrating an operating system at initiation of a cycle, in accordance with the present invention; FIG. 4 is an enlarged partially exploded perspective view of a portion of the operating system of FIG. 3, at subsequent position of the cycle”)</p> <p><i>‘722 Patent File History:</i></p> <ul style="list-style-type: none"> • DAV000053: “The drawings clearly show that the piston is removable through from the cylinder through the forward opening when the plug is removed... FIG. 3 clearly shows that when plug 43 is removed, the piston will fit through the opening.” • DAV000078 (referring to “the applicant’s claimed rifle with ... piston assembly coupled to the barrel. The piston assemblies have a cylinder with an open forward end that is made open or closed by a plug. When the plug is removed, the piston is capable of being removed from the front of the cylinder.”) 	<p><i>Letter from Dr. John P. Keady to Robert Davies (circa July 23, 2012)</i></p> <ul style="list-style-type: none"> • DAV02430-DAV02434
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Claim term: “tubular handguard encircling the barrel”

Party or Parties	Proposed Construction	Supporting Intrinsic Evidence	Supporting Extrinsic Evidence
Davies Innovations Inc.	Plain and ordinary meaning, i.e., “tubular handguard encircling the barrel”	None provided.	None provided.
Sturm, Ruger & Company, Inc.	“A substantially circular handguard composed of one or more pieces”	<p><u>‘722 Patent:</u> Abstract; 2:50-56, 2:60-64, 3:12-17, 5:25-29, 5:54-57, 6:1-9, 6:48-51, 8:19-22, 9:11-14; Figs. 1, 5, 6, 7, 9, 9a, 11, 12, 18 and 19; and Claims 1, 5, 8, 9.</p> <p><u>‘722 Pat. File History:</u> 1/10/07 Office Action, pp. 2 5/8/07 Resp., pp. 2, 3, 5- 7, 9-12 3/12/08 Appeal Br., pp. 4-7, 9, 11, 14- 16, 19, 20, 22- 24, 26 6/30/08 Resp. to Notice of Non-Compliant Appeal Br., pp. 3 7/7/09 Office Action, pp. 6, 8 10/7/09 Resp., pp. 4, 6- 11 11/12/09 Office Action, pp. 3-5 2/05/10 Resp., pp. 2, 3, 5- 7, 11</p>	<p>Oxford Dictionary (1999) “Tubular”, def. 1: “Tube shaped.”; “Tubular”, def. 1: “a long hollow rigid or flexible cylinder, esp for holding or carrying air, liquids, etc.” Merriam-Webster (10th Ed. 1998) “Encircle”, def. 1: “to form a circle around”</p> <p>DAV000457</p> <p>DAV000511, DAV000514-518</p> <p>DAV001533</p> <p>DAV02430-DAV02434</p>

		<p>2/05/10 Rule 131 Decl. with Included Presentation 9/16/10 Resp., pp. 3 9/17/10 Interview Summ.</p> <p><u>11/027956 Application:</u> 4/17/06 Resp., pp. 2, 4 11/25/05 Resp., pp. 2</p> <p><u>10/140268 Application:</u> 6/3/04 Resp., pp. 2, 4, 7, 13, 17 11/21/03 Resp., pp. 2, 4, 7, 10, 12- 14</p>	
SIG Sauer, Inc.	<p>“A one-piece, generally cylindrical handguard that continuously surrounds the barrel”</p>	<p><i>‘722 Patent Specification:</i></p> <ul style="list-style-type: none"> • Col. 6, ll. 1-7 (“Barrel nut 68 also carries a hand guard 69 having a central void 71 and a channel 74 extending therealong and adjacent thereto (see FIG. 9 and FIG. 9 a) and is described in detail in co-pending U.S. patent application entitled “RIFLE HANDGUARD SYSTEM WITH INTEGRATED BARREL NUT” filed 25 Mar. 2002, Ser. No. 10/105,700, herein incorporated by reference.”); • Figures 1, 9 & 9a; • Col. 3, ll. 21-25, 46-49 (“The foregoing and further and more specific objects and advantages 	<p><i>Image of Aspects of Mr. Davies’ Commercial Embodiment</i></p> <ul style="list-style-type: none"> • DAV000457 <p><i>Excerpts from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000511, DAV000514-518 <p><i>Excerpt from Article in January 2003 Issue of Guns & Weapons for Law Enforcement</i></p> <ul style="list-style-type: none"> • DAV01533 (“The rear of the handguard tube is a friction fit over the barrel nut, which also helps guide it into place.... The current handguard is

		<p>of the invention will become more readily apparent to those skilled in the art from the following detailed description of a preferred embodiment thereof, taken in conjunction with the drawings in which: ... FIG. 9 is an enlarged partial perspective view of a portion of the operating system with handguard attached; FIG. 9a is an exploded partial perspective view illustrating the handguard carried by the barrel nut”)</p> <p><i>‘722 Patent File History:</i></p> <ul style="list-style-type: none"> • DAV000022, Summary of September 13, 2010 Interview (describing how “US 6694660 incorporated by reference by the applicant”); • DAV000058, DAV000069, DAV000070, Rule 131 Declaration (“The eleventh and twelfth slides are photographs of my invention as described and claimed in the above identified application showing an enlarged view of the handguard as mounted on a firearm.”) • DAV000064 & DAV000068 	<p>machined, but full production ones will be extruded to reduce manufacturing costs.”</p> <p><i>Letter from Dr. John P. Keady to Robert Davies (circa July 23, 2012)</i></p> <ul style="list-style-type: none"> • DAV02430-DAV02434
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		<ul style="list-style-type: none"> • DAV000201 (referring to item 53 in Booth, U.S. 6,671,990 as disclosing a “tubular hand guard”) • DAV000191 (“Booth teaches a hand guard with a central void, but offers no teaching or suggestion of a channel adjacent thereto.”) • DAV000136-139 (noting that “co-pending U.S. Patent Application ... serial number 10/105,700 incorporated in its entirety in this application.”) • DAV000147-148 (“As stated in the rejection, Langendorfer does not teach the details of the handguard ... Specifically, Langendorfer teaches handguards 31. In a conventional rifle of this type, the handguard is formed of two halves. While not specifically described, this must be the case by the use of the plural.”) • DAV000127 (“The specifics of the handguard (forward end, rearward end and central void) have been addressed by pointing out that they are described in detail in an application, now patent, incorporated by reference. The 	
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		<p>element claimed wherein the forward end of the handguard is open to permit access to the barrel coupling of the operating system is clearly stated in the explanation of the subject matter of the independent claims as being shown in FIG. 9. However, there is no specific language in the specification to which attention can be directed, as it is simply shown in FIG. 9.”)</p>	
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Claim term: “channel providing clearance for the operating system”

Party or Parties	Proposed Construction	Supporting Intrinsic Evidence	Supporting Extrinsic Evidence
Davies Innovations Inc.	Plain and ordinary meaning, i.e., “channel providing clearance for the operating system”	None provided.	None provided.
Sturm, Ruger & Company, Inc.	Both Ruger and SIG agree on the following proposed construction: “a space within the handguard extending to the forward part of the handguard and giving space to accommodate the operating system”	<p><u>‘722 Patent:</u> Abstract; 2:30-34, 2:40-44; 4: 25-35, 6:1-7; Figs. 1, 3, 4, 5, 8 and 9, 9a; and Claims 1, 5, 8</p> <p><u>‘722 Pat. File History:</u> 2/5/10 Resp., pp. 2, 5, 7, 2/05/10 Rule 131 Decl. with Included Presentation 10/7/09 Resp., pp. 2, 4, 7, 9, 10, 12, 14 ,15 6/3/08 Resp., pp. 2 3/12/08 Appeal Br., pp. 4- 7, 9- 16 10/16/07 Office Action, pp. 3 5/8/07 Resp., pp. 2, 5, 7, 10-12 1/10/07 Office Action, pp. 2, 14, 15</p>	<p>DAV000424</p> <p>DAV000457</p> <p>DAV000557</p> <p>DAV000511, DAV000514-518</p> <p>DAV02430-DAV02434</p>

SIG Sauer, Inc.	<p>Both Ruger and SIG agree on the following proposed construction:</p> <p>“a space within the handguard extending to the forward part of the handguard and giving space to accommodate the operating system”</p>	<p><i>‘722 Patent Specification:</i></p> <ul style="list-style-type: none"> • Col. 6, ll. 1-7 (“Barrel nut 68 also carries a hand guard 69 having a central void 71 and a channel 74 extending therealong and adjacent thereto (see FIG. 9 and FIG. 9 a) and is described in detail in co-pending U.S. patent application entitled “RIFLE HANDGUARD SYSTEM WITH INTEGRATED BARREL NUT” filed 25 Mar. 2002, Ser. No. 10/105,700, herein incorporated by reference.”); • FIGS. 1, 9 & 9a <p><i>‘722 Patent File History:</i></p> <ul style="list-style-type: none"> • DAV000022, Summary of September 13, 2010 Interview (describing how “US 6694660 incorporated by reference by the applicant”) • DAV000058 and DAV000064, Rule 131 Declaration (“The sixth slide is a photograph of my invention as described and claimed in the above identified application showing the forward portion thereof, and illustrating the channel which provides 	<p><i>Image of Aspects of Mr. Davies’ Commercial Embodiment</i></p> <ul style="list-style-type: none"> • DAV000457 <p><i>Excerpts from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000511, DAV000514-DAV000518 <p><i>Excerpt from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000557 <p><i>Letter from Dr. John P. Keady to Robert Davies (circa July 23, 2012)</i></p> <ul style="list-style-type: none"> • DAV02430-DAV02434
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		<p>clearance for elements of the operating system”)</p> <ul style="list-style-type: none">• DAV000103-DAV000104 (“This channel is defined by its function, namely providing clearance for the operating system. Since clearance is required, it is inherent that at least portions of the operating system are within the channel. Thus the size and position of the channel is defined in relation to the operating system.”)• DAV000191 (“Thus the handguard has a central void and also has a channel adjacent thereto. As can be seen clearly in FIG. 9 of the present application, the channel provides space for the operating system.”)• DAV000136-139 (noting that “co-pending U.S. Patent Application ... serial number 10/105,700 incorporated in its entirety in this application.”)• DAV000142 & DAV000144 (noting that the channel of the invention must “extend to the forward portion of the handguard”)	
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Claim term: “barrel coupling”

Party or Parties	Proposed Construction	Supporting Intrinsic Evidence	Supporting Extrinsic Evidence
Davies Innovations Inc.	“a device for connecting the rifle’s barrel to at least one other component of the rifle”	None provided.	Oxford dictionary definition for “coupling” – “A device for connecting parts of machinery” (DAV004569-4573)
Sturm, Ruger & Company, Inc.	Both Ruger and SIG agree on the following proposed construction: “a base member for affixing at least the piston assembly of the operating system to the barrel”	<u>‘722 Patent:</u> Abstract; 2:32-34, 2:34-39, 2:40-44, 4:31-35, 8:22-24, 8:39-41 Figs. 2, 3, 4 and 9. Claims 1, 5, 6, 8 and 11 <u>‘722 Pat. File History:</u> 5/8/07 Resp., pp. 2, 3, 7, 8, 10 3/12/08 Appeal Br., pp. 4, 6, 7, 9, 11, 15 6/30/08 Resp., pp. 2, 3 10/7/09 Resp., pp. 4, 9, 13, 14 11/7/09 Office Action, pp. 3 2/5/10 Resp., pp. 2, 7 2/05/10 Rule 131 Decl. with Included Presentation	DAV000424 DAV000555 DAV000511, DAV000514-518 DAV02430-DAV02434
SIG Sauer, Inc.	Both Ruger and SIG agree on the following proposed construction:	<i>‘722 Patent Specification:</i> • Col. 2, ll. 32-34 (“The operating system includes a piston assembly coupled to the barrel for receiving propelling gasses from the barrel.”)	<i>Image of Aspects of Mr. Davies’ Commercial Embodiment</i> • DAV000424

	<p>“a base member for affixing at least the piston assembly of the operating system to the barrel”</p>	<ul style="list-style-type: none"> • Col. 4, ll. 31-35 (“Referring to FIGS. 3 and 4, operating system 20 includes a cylindrical base member 30 receivable about barrel 14 (illustrated in broken lines), a manifold 32 carried by base member 30, and a piston assembly 34 carried by base member 30, adjacent manifold 32.”) • FIGS. 2, 3, 4, 8, 9 <p><i>‘722 Patent File History:</i></p> <ul style="list-style-type: none"> • DAV000064 • DAV000068 • DAV000071 • DAV000078 (referring to “the applicant’s claimed rifle with ... piston assembly coupled to the barrel. The piston assemblies have a cylinder with an open forward end that is made open or closed by a plug. When the plug is removed, the piston is capable of being removed from the front of the cylinder.”) 	<p><i>Excerpts from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000511, DAV000514-DAV000518 <p><i>Excerpt from May 30, 2010 Slide Presentation by Robert B. Davies</i></p> <ul style="list-style-type: none"> • DAV000555 <p><i>Letter from Dr. John P. Keady to Robert Davies (circa July 23, 2012)</i></p> <ul style="list-style-type: none"> • DAV02430-DAV02434
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Claim term: “passage of the piston/push rod assembly”

Party or Parties	Proposed Construction	Supporting Intrinsic Evidence	Supporting Extrinsic Evidence
Davies Innovations Inc.	Plain and ordinary meaning, i.e., “passage of the piston/push rod assembly”	None provided.	None provided.
Sturm, Ruger & Company, Inc.	Both Ruger and SIG agree on the following proposed construction: “removal of the piston and push rod assembly resulting from movement through the forward (front) end of the cylinder”	<u>‘722 Patent:</u> 4:32-35, 4:42-44, 4:50-51, 8:25-30, 8:39-46; 9:51-55; Figs. 2, 3, 4, 5; and Claims 1, 5, 8, 9, 10. <u>‘722 Pat. File History:</u> 10/7/09 Resp., pp. 4, 7, 9, 13 11/7/09 Office Action, pp. 2, 3 2/5/10 Resp., pp. 2, 5, 7, 10-11	DAV000555 DAV000511, DAV000514-518 DAV02430-DAV02434
SIG Sauer, Inc.	Both Ruger and SIG agree on the following proposed construction: “removal of the piston and push rod assembly resulting from movement through the forward (front) end of the cylinder”	<i>‘722 Patent Specification:</i> • FIGS. 3 & 4 <i>‘722 Patent File History:</i> • DAV000053: “The drawings clearly show that the piston is removable through from the cylinder through the forward opening when the plug is removed ... FIG. 3 clearly shows that when plug 43 is removed, the piston will fit through the opening.”	<i>Excerpts from May 30, 2010 Slide Presentation by Robert B. Davies</i> • DAV000511, DAV000514-DAV000518 <i>Excerpt from May 30, 2010 Slide Presentation by Robert B. Davies</i> • DAV000555

		<ul style="list-style-type: none">• DAV000077: “Claims 30, 36 and 41 recite a rifle with a piston, cylinder and end plug arranged in such a way that if the end plug is removed the piston is permitted to pass through the forward end of the cylinder.”• DAV000078 (referring to “the applicant’s claimed rifle with ... piston assembly coupled to the barrel. The piston assemblies have a cylinder with an open forward end that is made open or closed by a plug. When the plug is removed, the piston is capable of being removed from the front of the cylinder.”)	<p><i>Letter from Dr. John P. Keady to Robert Davies (circa July 23, 2012)</i></p> <ul style="list-style-type: none">• DAV02430-DAV02434
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